PCBs: Follow up to November 17, 2009 Conference Call Re: 100 California Street

Carmen Santos to: CBaker, Bob 11/19/2009 12:58 PM

Cc: Steve Armann

Hello, Chaudel and Bob:

Below is a summary of information needed to complete the cleanup notification to USEPA concerning 100 California Street. I was not able to send this earlier. If you have any questions, please call me. I will not be in the office tomorrow and next week, and will be checking my voice mail and e-mail messages.

The following puts in perspective the guidance provided below. Removal and disposal of PCB bulk product waste in accordance with 40 CFR 761.62 and cleanup / decontamination of substrate and disposal of PCB remediation wastes in accordance with 761.61(a) (or 761.61(c)) and 761.79(h).

Signed Certification

Please submit the written, signed certification required in 40 CFR 761.61(a)(3)(i)(E). The Certification should include the language in this regulation and under "Certification" in 40 CFR 761.3 (definitions). The certification must be signed by the property owner and the party conducting the PCB cleanup. Please call me if you have questions regarding the certification language.

Section 1 - Categorization (Tab 1), Item 2, Characterization

- Dates of pre-cleanup sampling. Please revise Tables 1 and 2 to include the dates of pre-cleanup sampling. See 40 CFR 761.61(a)(3)(i)(B) for more details.
- Summary and description of sampling procedures . See 40 CFR 761.61(a)(3)(i)(B) for more details. Please ensure the Notification includes all the sampling procedures that will be used and refer to the attached standard wipe test procedures and QA/QC for wipe sampling using the Standard Wipe Test (defined in 40 CFR 761.123).
- Location and extent of PCB contamination . Please include the approximate exterior surface area (square feet) of the building that will be subject to PCB cleanup. Please add to the site characterization information that Aroclors 1254 and 1260 were detected in caulk samples collected from the building exterior. Otherwise, location and extent of contamination seems well covered in Tab 1. For additional details, please see 40 CFR 761.61(a)(3)(i)(C).
- Pilot study at 100 California Street and 95% CL Table. The pilot study section should be revised to be consistent with the requirements in 40 CFR 761.79(h).

  Please revise the pilot study narrative to incorporate a correlation of the wipe and bulk sample results collected as part of the pilot study to the concentration of PCBs in caulk removed from the locations used for the pilot study. Confirm if the pilot study involved locations in the external surfaces of the building that has caulk with high PCB concentrations (e.g., 20,000+ ppm PCBs). In Table 2, which of the bulk and wipe samples are representative of areas with caulk containing high concentrations of PCBs? Table 2 should include the detection limit for all the samples. Appropriate units for the wipe samples (ug / 100 square centimeters) should be reported. If the sampled area is smaller than 100 square centimeters, refer to 40 CFR 761.243(b) to report the wipe analysis results appropriately. The 95% CL table in Tab 1 needs revision. Wipe sample results should be evaluated in this table separately from the bulk samples. Post cleanup bulk samples verify PCB concentrations remaining in the substrate matrix after grinding stone and cleaning up the stone with the proposed solvent; and standard wipe samples verify surface PCB concentrations remaining on the substrate surface.

  In Tab 1, it is stated that about 29 stone panels will be removed and replaced from the building facade. To validate the pilot study, we ask that a limited number of bulk samples be collected from a few of these stone panels from areas that were in contact with PCB-containing caulk. After grinding

and cleaning up these areas using the proposed solvent, collect bulk and standard wipe samples to determine the effectiveness of the cleanup. We recommend a validation of the pilot study be conducted because we understand that bulk samples (chips from marble and granite stone) will not be collected for cleanup verification to prevent cracking of these decorative stones on the building 's facade. Based on pilot study data, the area of the decorative stones that is in contact with caulk is porous.

- Tentatively, we are considering the pilot study described in Tab 1 and the pilot study verification requested above as the documentation required under 40 CFR 761.79(h), alternative decontamination and sampling.

Items 3 and 4, Exposure Potential and Cleanup Levels , Tab 1

- **Cleanup levels .** We need to get closure on this issue. In addition to other information, the pilot study (after clarified) will help determine best options for cleanup verification levels specially in areas where the caulk contains PCB concentrations in thousands of parts per million (ppm). We want to verify based on the pilot study that PCBs remaining in the stone substrate are not above the proposed cleanup level based on both bulk and wipe samples collected as part of the pilot study . However, due to the nature of the decorative stone, collection of bulk cleanup verification samples may compromise the integrity of the stone. Standard wipe samples appear to be the safest option for cleanup verification. A PCB cleanup level for all exterior surfaces (stone and metal) that have been cleaned up (e.g., grinding and solvent cleaning) and are no longer in contact with PCB-containing caulk could potentially be based on surface standard wipe samples. Please also refer to the pilot study section of this message. For example a cleanup level of less than 5 ug / 100 square centimeters could be used for Floors 2 through 15. Please propose a cleanup level.

Item 5, Site Cleanup , Tab 1

- **Decontamination of sampling equipment and tools** . For reference, please see 40 CFR 761.79(c) (self implementing decontamination). Please add a section addressing decontamination of sampling equipment and tools.
- **Disposal technologies .** For details, please refer to 40 CFR 761.61(a)(3)(i)(D). After removed, the caulk must be disposed offsite as PCB bulk product waste in accordance with 40 CFR 761.62 (a), (b), or (c). Options in 761.62(a) and (b) are most expeditious. Scraped substrate that comes along with particles of PCB caulk and dust from grinding the substrate and caulk residue must be disposed of as PCB bulk product waste. We do not recommend segregating caulk at less than 50 ppm PCBs from caulk with 50 ppm or higher. Based on pre-cleanup data offsite disposal of all the caulk as PCB bulk product waste may be more cost and time effective. Cleanup wastes such as non-liquid cleaning materials (e.g., rags) and personal protective equipment must be disposed offsite in accordance with 40 CFR 761.61(a)(5)(v). See 40 CFR 761.62 and 761.61(a)(5) for proper disposal of wastes that will be generated at the cleanup site.
- **Cleanup plan .** Ensure the cleanup plan addresses all the substrates in the exterior of the building in contact with PCB-containing caulk. Isopropanol is proposed as the solvent to cleanup surfaces that have been in contact with PCB-containing caulk. For the applicability of this solvent to decontaminate the exterior surfaces of the building, refer to 40 CFR 761.79(h), the pilot study section of this message, and 40 CFR 761.61(a)(3)(i)(D). Please confirm the solubility of PCBs (in percent) in the proposed solvent.

Recordkeeping

- **Recordkeeping requirements .** Please refer to 40 CFR 761.61(a)(9), 761.79(f), and 761.79(h).

Deed notice

- **Deed notice .** We need to have a dialogue on this issue. This issue does not need to be resolved before cleanup is conducted.

Regards,

Carmen D. Santos, Project Manager
RCRA Corrective Action Office
Waste Management Division
USEPA Region 9
415.972.3360
fax: 415.947.3533